

EXHIBIT C

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

WESTERN ORGANIZATION OF
RESOURCE COUNCILS et al.,

Plaintiffs,

v.

UNITED STATES BUREAU OF LAND
MANAGEMENT,

Defendant,

and

STATE OF WYOMING,

Intervenor-Defendant.

Case No. 4:20-cv-00076-BMM-JTJ

**DECLARATION OF
THOMAS BILLS**

**CERTIFICATION OF THE ADMINISTRATIVE RECORD
FOR MILES CITY RESOURCE MANAGEMENT PLAN**

I, Thomas Bills, in accordance with the requirements of 28 U.S.C § 1746 declare as follows:

1. I am employed by the United States Department of the Interior, Bureau of Land Management, as a Planning and Environmental Coordinator for the BLM Buffalo Field Office. I have been employed in this position since November 2006. My responsibilities, as an employee of BLM, included being the 2015 Resource Management Plan (RMP) project manager and the project manager for the subsequent court ordered RMP amendment and supplemental Environmental Impact Statement (EIS). I provided leadership and guidance to the interdisciplinary team and management, reviewed documents, and compiled the

pertinent documents BLM considered in making the agency decision challenged in CV-20-00076-BMM-JTJ.

2. BLM is hereby submitting the Buffalo RMP Amendment Administrative Record. BLM's Administrative Record is contained on one USB flash drive labeled "WORC v. BLM, Buffalo RMP AR" in searchable format with a hyperlinked index that provides the following information for each document in the record: starting and ending bates number for each document, date, author, recipient(s) and description of the document.
3. I hereby certify to the best of my knowledge the files being provided to the Court and the parties are true, accurate, and complete copies of the documents and materials listed in the index for the administrative record.
4. I further certify that the documents listed in the index and included in the USB flash drive being provided to the Court constitute a true, correct, and complete copy of the administrative record relevant to BLM's decision concerning the Buffalo RMP challenged in this action

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed this 3rd day of September 2021, in Buffalo, Wyoming.



Thomas Bills
Planning and Environmental Coordinator
Buffalo Field Office, BLM